

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION**

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FUND RECOVERY SERVICES, LLC, a )  
Delaware limited liability company, as assignee )  
of PRINCETON ALTERNATIVE INCOME )  
FUND, L.P., a New Jersey limited partnership, )  
 )  
Plaintiff, ) Case No.: 2:21-cv-00093-PPS-JEM  
 )  
v. ) Hon. John E. Martin  
 ) United States Magistrate Judge  
RAVIV WOLFE, an individual, and )  
KATHERINE WOLFE, an individual, )  
 )  
Defendants. )  
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**MOTION TO WITHDRAW**

Kenneth J. Ashman (“Ashman”), counsel of record to Plaintiff Fund Recovery Services, LLC (“Plaintiff”), hereby moves to withdraw his appearance and representation of Plaintiff, stating as follows:

1. On July 12, 2021, Ashman filed his appearance on behalf of Plaintiff in this matter [Dkt. 20].
2. Without providing the details (but which would be disclosed if requested by the Court), irreconcilable differences have arisen between Ashman and Plaintiff, preventing the continued representation by Ashman of Plaintiff in this matter.
3. Plaintiff is also represented by Gerard M. McCabe, as lead counsel, admitted *pro hac vice* on August 8, 2022 [Dkt. 58], and by Ryan A. Deutmeyer and Michael J. Jasaitis, as local counsel, with appearances filed on March 15, 2021 [Dkts. 2 and 3].
4. As such, Plaintiff will not be prejudiced by the grant of this motion. The grant of the motion will not delay the trial of this case.

**WHEREFORE**, Ashman respectfully requests that this Court issue an Order granting Ashman's withdrawal from the representation of Plaintiff in this case, and providing such other and further relief as this Court may deem just and proper.

Dated: February 15, 2024

Respectfully submitted,

KENNETH J. ASHMAN,



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Kenneth J. Ashman  
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**CERTIFICATE OF SERVICE**

I, Kenneth J. Ashman, certify that on February 15, 2024, true and correct copies of the foregoing was filed electronically through the Northern District of Indiana CM/ECF electronic filing system, which will send a notification of filing to all counsel of record and unrepresented parties.



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Kenneth J. Ashman